

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHROME HEARTS, LLC, a Delaware  
Limited Liability Company

PLAINTIFF(S)

v.

FASHION NOVA, LLC., a California  
Limited Liability Company; NOVA  
FASHION, INC.; a California Corp.

DEFENDANT(S)

CASE NUMBER: 2:24-cv-07464-AB-BFM

**REQUEST FOR APPROVAL OF  
SUBSTITUTION OR WITHDRAWAL  
OF COUNSEL**

**INSTRUCTIONS**

Generally, an attorney may withdraw from representing a party in a case without the Court's permission **if** another member of the attorney's firm or agency will continue to represent that party **and** the withdrawing attorney is not the only member in good standing of the Bar of this Court representing that party. In that circumstance, the withdrawing attorney should complete and file a "Notice of Appearance or Withdrawal of Counsel" (Form G-123), instead of this "Request for Approval of Substitution or Withdrawal of Counsel" (Form G-01).

Notably, however, Court permission for withdrawal or substitution **is** required if no member of the withdrawing attorney's firm or agency will remain as counsel of record. In such circumstances, the attorney(s) seeking to withdraw should complete and file this "Request for Approval of Substitution or Withdrawal of Counsel" (Form G-01), and submit a proposed "Order on Request for Approval of Substitution or Withdrawal of Counsel" (Form G-01 Order).

If the circumstances surrounding an attorney's withdrawal or request to substitute other counsel are not covered by this Form G-01, the attorney may instead file a regularly noticed motion supported by a more detailed memorandum of points and authorities.

**SECTION I - WITHDRAWING ATTORNEY**

*Please complete the following information for the attorney seeking to withdraw (provide the information as it currently appears on the docket; if the attorney appeared pro hac vice, enter "PHV" in the field for "CA Bar Number"):*

Name: Dana J. Finberg / Kristal Sinaj CA Bar Number: 257459 / 351747

Firm or agency: O'Hagan Meyer, LLC

Address: One Embarcadero Center, Suite 2100, San Francisco, CA 94111

Telephone Number: 415.578.6900

E-mail: dfinberg@ohaganmeyer.com / ksinaj@ohaganmeyer.com

Counsel of record for the following party or parties: Defendant Fashion Nova, LLC and Defendant Nova Fashion, Inc.

Other members of the same firm or agency also seeking to withdraw: \_\_\_\_\_

**SECTION II - NEW REPRESENTATION**

- ☐ No new counsel is necessary. The party or parties represented by the attorney(s) seeking to withdraw will continue to be represented by another attorney/firm who has already entered an appearance as counsel of record for that party or parties in this case, and who is a member in good standing of the Bar of this Court.
- ☐ The party or parties represented by the attorney(s) seeking to withdraw have not retained new counsel and wish to proceed *pro se*, as self-represented litigants.
- ☒ The party or parties represented by the attorney(s) seeking to withdraw have retained the following new counsel, who is a member in good standing of the Bar of this Court:

Name: Andrew S. Dallmann CA Bar Number: 206771

Firm or agency: Key Kesan Dallmann PLLC

Address: 23187 La Cadena Dr., Suite 102 Laguna Hills, CA 92653

Telephone Number: 951-678-2267

E-mail: andrew.dallmann@kkd-law.com

**SECTION III - SIGNATURES****Withdrawing Attorney**

I am currently counsel of record in this case, and am identified above in Section I as the "Withdrawing Attorney." I have given notice as required by Local Rule 83-2.3. I hereby request that I and any other attorney(s) listed in Section I be allowed to withdraw from this case.

Date: May 23, 2025

Signature: Kristal Sinaj

Name: Kristal Sinaj

**New Attorney (if applicable)**

I have been retained to appear as counsel of record in this case, and my name and contact information are given above in Section II. I am a member in good standing of the Bar of this Court.

Date: \_\_\_\_\_

Signature: Andrew Dallmann

Name: Andrew S. Dallmann

**Party Represented by Withdrawing Attorney**

I am currently represented by, or am an authorized representative of a party currently represented by, the Withdrawing Attorney listed above. I consent to the withdrawal of my current counsel, and to (*check if applicable*):

☒ substitution of counsel as specified above.

☐ representing myself *pro se* in this case.

Date: \_\_\_\_\_

Signature: Olga B'Chir

Name: \_\_\_\_\_

Title: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

*Chrome Hearts LLC v. Fashion Nova, LLC, et al*  
United States District Court, Central District of California  
Case No. 2:24-cv-07464-AB-BFM

I, the undersigned, hereby declare:

At the time of service, I was over 18 years of age and not a party to this action. My business address is One Embarcadero Center, Suite 2100, San Francisco, CA 94111.

On May 27, 2025, I served true copies of the following document(s):

**REQUEST FOR APPROVAL OF SUBSTITUTION OR WITHDRAWAL OF COUNSEL**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Brent H. Blakely Tara A. Currie BLAKELY LAW GROUP 1108 Manhattan Ave., Unit B Manhattan Beach, CA 90266	<i>[Attorneys for Plaintiff Chrome Hearts LLC]</i>  Tel: (310) 546-7400 Fax: (310) 546-7401 Email: <a href="mailto:bblakely@blakelylawgroup.com">bblakely@blakelylawgroup.com</a> <a href="mailto:tcurrie@blakelylawgroup.com">tcurrie@blakelylawgroup.com</a>
Andrew S. Dallman KEY DESAL DALLMANN PLLC 23187 La Cadena Dr., Suite 102 Laguna Hills, CA 92653	<i>Counsel of Record for Fashion Nova, Inc.</i>  Tel.: (951) 678-2267 Email: <a href="mailto:Andrew.dallmann@kkd-law.com">Andrew.dallmann@kkd-law.com</a>

I served the document(s) by the following means:

- ☒ By ECF delivery on the parties listed herein at their email addresses or email of record in this action.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on May 27, 2025, at San Francisco, California.

*/s/ Mabelene Valeros*

Mabelene Valeros